

Exhibit A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF DINA HLACE

Misc. Case No.: _____

REQUEST DISCOVERY PURSUANT TO
28 U.S.C. § 1782.

**DECLARATION OF JUAN MARTIN AROCENA IN SUPPORT OF
EX PARTE APPLICATION FOR DISCOVERY PURSUANT TO 28 U.S.C. § 1782**

I, Juan Martin Arocena, declare that the following is true and correct to the best of my knowledge and belief:

1. I am the managing partner and one of the founding partners of Dentons in Buenos Aires, Argentina (the “Firm”).

2. I obtained my law degree from la Universidad Católica Argentina in 1988 and am a member in good standing of the Bar Association of Buenos Aires, as well as the New York Bar.

3. Except as otherwise indicated herein, all the facts set forth in this declaration are based on my own personal knowledge or my review of relevant documents. To the extent matters stated in this Declaration are statements of legal opinion, those statements represent my view of the law of Argentina as a practicing attorney there.

4. I respectfully submit this Declaration in support of Dina Hlace’s (“Applicant”) application for an order from this Court granting discovery pursuant to 28 U.S.C. § 1782 (the “Application”), and authorizing her to issue and serve subpoenas for documents located in this District in the possession, custody, and/or control of HSBC USA, Inc., Bank of New York Mellon

Corporation, and Citigroup, Inc. (collectively, the “Financial Institutions”), related to any accounts under the name of Roberto Hlace and/or the HM Brokers Irrevocable Trust (the “Hlace Trust”).

5. The discovery requested in this Application is sought in connection with the current pending probate action in the Argentine National Court of First Instance for Civil Matters No. 97, Case No. 32244/2017, filed on May 24, 2017 (the “Argentine Proceeding”).

6. The purpose of the discovery sought in this Application is to obtain necessary information for the marshaling of funds under the name of Roberto Hlace and/or the Hlace Trust and assist the Argentine Tribunal in the pending Argentine probate Proceedings.

7. Moreover, Applicant has reason to believe that the trustees of the Hlace Trust, two Argentine nationals, have improperly concealed or transferred funds belonging to Roberto Hlace and/or the Hlace Trust through the use of accounts at the Financial Institutions. As a beneficiary of the Hlace Trust, Applicant reasonably contemplates initiating Judicial proceedings in Argentina against the trustees for their misconduct.

8. The discovery sought in this Application would assist and support Applicant’s reasonably contemplated proceeding against the trustees in Argentina.

Relevant Parties and Background

9. Applicant, Dina Hlace, is a resident of Argentina and the daughter of Roberto Hlace, who passed away on April 21, 2017.

10. Applicant is a beneficiary of the Hlace Trust created by Roberto Hlace in 2012, and an heir to Roberto Hlace.

11. On May 24, 2017, the estate of Roberto Hlace was admitted to probate and assigned Case No. 32244/2017 in the Argentine Proceeding.

12. The Argentine Proceeding remains pending, and Applicant is seeking to assist in the marshalling of the assets, specifically from the Financial Institutions and Accounts, which she has reason to believe have been improperly diverted from the estate of Roberto Hlace and the Hlace Trust.

13. The Financial Institutions are not parties to the Argentine Proceeding.

14. Applicant has reason to believe that Roberto Hlace, directly or through the Hlace Trust, held assets at the Financial Institutions which have not been disclosed in the Argentine Proceeding, and which were wrongfully diverted by the trustees.

15. Discovery of such evidence would be submitted to the Argentine Tribunal, and would assist the Tribunal in making determinations on the basis of such evidence.

16. If it is discovered through the evidence obtained through the 1782 Application, that the trustees have engaged in misconduct under Argentine Law, Applicant may commence judicial proceedings in Argentina for theft, fraud, and embezzlement, among other causes of action.

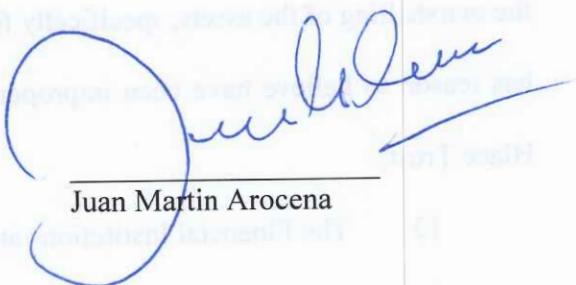
17. Pursuant to Argentine Law, the assets of a deceased must be disclosed to their heirs.

18. Furthermore, according to Argentine Law, the heir to an estate and/or the beneficiary of a trust may bring an action against a trustee if it is discovered that the trustee has committed theft, fraud, embezzlement, or other forms of misconduct.

19. Argentine law, pursuant to the Civil and Commercial Code of the Nation, Intestate Successions, Title IX, Articles 2424-2443, provides for a probate proceeding to, inter alia, disburse the applicable assets of the estate. Assuming the evidence obtained from the Financial Institutions reveals assets in, or transfers from or to, the Accounts, such evidence would be relevant and applicable to the current Argentine Proceeding.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 29, 2021



Juan Martin Arocena